Privacy Policy of www.learnenglishfacil.com

This Application collects some Personal Data from its Users.

Owner and Data Controller

LEF Educational Services Ltd - 14 Orchard Close - AL1 1JP - St Albans - UK Contacto: Español +44 7930241139

Owner contact email: support@learnenglishfacil.com

Types of Data collected

Among the types of Personal Data that this Application collects, by itself or through third parties, there are: Usage Data; Trackers; answers to questions; clicks; keypress events; motion sensor events; mouse movements; scroll position; touch events; first name; last name; email address; billing address; purchase history; date of birth; phone number; company name; country; device information; language; unique device identifiers for advertising (Google Advertiser ID or IDFA, for example); invoicing information; Data communicated while using the service; city; various types of Data; name; geographic position; calendar information; physical address; ZIP/Postal code; website; house number; data relating to the point of sale; profession; coarse location; general activity data.

Complete details on each type of Personal Data collected are provided in the dedicated sections of this privacy policy or by specific explanation texts displayed prior to the Data collection.

Personal Data may be freely provided by the User, or, in case of Usage Data, collected automatically when using this Application. Unless specified otherwise, all Data requested by this Application is mandatory and failure to provide this Data may make it impossible for this Application to provide its services. In cases where this Application specifically states that some Data is not mandatory, Users are free not to communicate this Data without consequences to the availability or the functioning of the Service

Users who are uncertain about which Personal Data is mandatory are welcome to contact the Owner. Any use of Cookies – or of other tracking tools — by this Application or by the owners of third-party services used by this Application serves the purpose of providing the Service required by the User, in addition to any other purposes described in the present document and in the Cookie Policy.

Users are responsible for any third-party Personal Data obtained, published or shared through this Application.

Mode and place of processing the Data

Methods of processing

The Owner takes appropriate security measures to prevent unauthorised access, disclosure, modification, or unauthorised destruction of the Data.

The Data processing is carried out using computers and/or IT enabled tools, following organisational procedures and modes strictly related to the purposes indicated. In addition to the Owner, in some cases, the Data may be accessible to certain types of persons in charge, involved with the operation of this Application (administration, sales, marketing, legal, system administration) or external parties (such as third-party technical service providers, mail carriers, hosting providers, IT companies, communications agencies) appointed, if necessary, as Data Processors by the Owner. The updated list of these parties may be requested from the Owner at any time.

Place

The Data is processed at the Owner's operating offices and in any other places where the parties involved in the processing are located.

Depending on the User's location, data transfers may involve transferring the User's Data to a country other than their own. To find out more about the place of processing of such transferred Data, Users can check the section containing details about the processing of Personal Data.

Retention time

Personal Data shall be processed and stored for as long as required by the purpose they have been collected for.

The purposes of processing

The Data concerning the User is collected to allow the Owner to provide its Service, comply with its legal obligations, respond to enforcement requests, protect its rights and interests (or those of its Users or third parties), detect any malicious or fraudulent activity, as well as the following: Displaying content from external platforms, SPAM protection, Tag Management, Interaction with external social networks and platforms, Handling payments, Contacting the User, Access to third-party accounts, Analytics, Traffic optimisation and distribution, User database management, Backup saving and management, Collection of privacy-related preferences, Connecting Data, Data transfer outside of the UK, Data transfer outside the EU, Handling activities related to productivity, Registration and authentication provided directly by this Application, Registration and authentication, Managing support and contact requests, Managing landing and invitation pages, Managing contacts and sending messages, Location-based interactions, Heat mapping and session recording and Handling activity data.

For specific information about the Personal Data used for each purpose, the User may refer to the section "Detailed information on the processing of Personal Data".

Detailed information on the processing of Personal Data

Personal Data is collected for the following purposes and using the following services:

Access to third-party accounts

This type of service allows this Application to access Data from your account on a third-party service and perform actions with it. These services are not activated automatically, but require explicit authorisation by the User.

Mailchimp account access (Intuit Inc.)

This service allows this Application to connect with the User's account on Mailchimp, provided by Intuit Inc.

Personal Data processed: country; email address; first name; last name; phone number.

Place of processing: United States – Privacy Policy.

Category of Personal Information collected according to CCPA: identifiers.

This processing constitutes:

• a Sale in California

Stripe account access (Stripe Payments Ltd)

This service allows this Application to connect with the User's account on Stripe, provided by Stripe, Inc.

Personal Data processed: device information; email address; first name; last name; Trackers; Usage Data.

Place of processing: United Kingdom – <u>Privacy Policy</u>.

Category of Personal Information collected according to CCPA: identifiers; internet information.

This processing constitutes:

• a Sale in California

Analytics

The services contained in this section enable the Owner to monitor and analyse web traffic and can be used to keep track of User behaviour.

Google Analytics (Universal Analytics) (Google Ireland Limited)

Google Analytics (Universal Analytics) is a web analysis service provided by Google Ireland Limited ("Google"). Google utilises the Data collected to track and examine the use of this Application, to prepare reports on its activities and share them with other Google services.

Google may use the Data collected to contextualise and personalise the ads of its own advertising network.

In order to understand Google's use of Data, consult **Google's partner policy**.

Personal Data processed: Trackers; Usage Data.

Place of processing: Ireland – Privacy Policy – Opt Out.

Category of Personal Information collected according to CCPA: internet information.

This processing constitutes:

• a Sale in the United States

Cloudflare Web Analytics (Cloudflare Inc.)

Cloudflare Web Analytics is an anonymised analytics service provided by Cloudflare Inc. that gives the Owner insight into the use of this Application by Users without needing to identify them. Further information may be found here and within the service's privacy policy.

Personal Data processed: device information; language; Usage Data.

Place of processing: United States – Privacy Policy.

Category of Personal Information collected according to CCPA: internet information; inferred information.

This processing constitutes:

• a Sale in California

Google Analytics Demographics and Interests reports (Google Ireland Limited)

Google Analytics Demographics and Interests reports is a Google Advertising Reporting feature that makes available demographic and interests Data inside Google Analytics for this Application (demographics means age and gender Data).

Users can opt out of Google's use of cookies by visiting Google's <u>Ads Settings</u>.

Personal Data processed: Trackers; unique device identifiers for advertising (Google Advertiser ID or IDFA, for example).

Place of processing: Ireland – <u>Privacy Policy</u> – <u>Opt Out</u>.

Category of Personal Information collected according to CCPA: identifiers; internet information.

This processing constitutes:

• a Sale in California

Backup saving and management

This type of service allows the Owner to save and manage backups of this Application on external servers managed by the service provider itself. The backups may include the source code and content as well as the data that the User provides to this Application.

Backup on Dropbox (Dropbox, Inc.)

Dropbox is a service to save and manage backups provided by Dropbox Inc.

Personal Data processed: various types of Data as specified in the privacy policy of the service.

Place of processing: United States – <u>Privacy Policy</u>.

Category of Personal Information collected according to CCPA: identifiers.

This processing constitutes:

Backup on Google Drive (Google Ireland Limited)

Google Drive is a service to save and manage backups provided by Google Ireland Limited.

Personal Data processed: various types of Data as specified in the privacy policy of the service.

Place of processing: Ireland – Privacy Policy.

Category of Personal Information collected according to CCPA: identifiers.

This processing constitutes:

Collection of privacy-related preferences

This type of service allows this Application to collect and store Users' preferences related to the collection, use, and processing of their personal information, as requested by the applicable privacy legislation.

iubenda Privacy Controls and Cookie Solution (iubenda srl)

The iubenda Privacy Controls and Cookie Solution allows the Owner to collect and store Users' preferences related to the processing of personal information and in particular to the use of Cookies and other Trackers on this Application.

Personal Data processed: Trackers.

Place of processing: Italy – <u>Privacy Policy</u>.

Category of Personal Information collected according to CCPA: internet information.

This processing constitutes:

iubenda Consent Database (iubenda srl)

The iubenda Consent Database allows to store and retrieve records of Users' consent to the processing of Personal Data, and information and preferences expressed in relation to the provided consent.

In order to do so, it makes use of a Tracker that temporarily stores pending information on the User's device until it is processed by the API. The Tracker (a browser feature called localStorage) is at that point deleted.

Personal Data processed: Data communicated while using the service; Trackers.

Place of processing: Italy – Privacy Policy.

Category of Personal Information collected according to CCPA: internet information.

This processing constitutes:

Connecting Data

This type of service allows the Owner to connect Data with third-party services disclosed within this privacy policy. This results in Data flowing through these services, potentially causing the retention of this Data.

Zapier (Zapier, Inc.)

Zapier is a workflow automation service provided by Zapier, Inc. that automates the movement of Data between (third-party) services.

Personal Data processed: city; company name; country; date of birth; device information; email address; first name; language; last name; phone number; Usage Data.

Place of processing: United States – <u>Privacy Policy</u>.

Category of Personal Information collected according to CCPA: identifiers; commercial information; internet information; inferred information.

This processing constitutes:

Contacting the User

Contact form (this Application)

By filling in the contact form with their Data, the User authorises this Application to use these details to reply to requests for information, quotes or any other kind of request as indicated by the form's header.

Personal Data processed: company name; country; date of birth; email address; first name; last name; phone number.

Category of Personal Information collected according to CCPA: identifiers; commercial information.

This processing constitutes:

• a Sale in California

Mailing list or newsletter (this Application)

By registering on the mailing list or for the newsletter, the User's email address will be added to the contact list of those who may receive email messages containing information of commercial or promotional nature concerning this Application. Your email address might also be added to this list as a result of signing up to this Application or after making a purchase.

Personal Data processed: company name; country; date of birth; email address; first name; last name; Usage Data.

Category of Personal Information collected according to CCPA: identifiers; commercial information; internet information.

This processing constitutes:

• a Sale in the United States

Phone contact (this Application)

Users that provided their phone number might be contacted for commercial or promotional purposes related to this Application, as well as for fulfilling support requests.

Personal Data processed: phone number.

Category of Personal Information collected according to CCPA: identifiers.

This processing constitutes:

• a Sale in California

Displaying content from external platforms

This type of service allows you to view content hosted on external platforms directly from the pages of this Application and interact with them.

This type of service might still collect web traffic data for the pages where the service is installed, even when Users do not use it.

Google Fonts (Google Ireland Limited)

Google Fonts is a typeface visualisation service provided by Google Ireland Limited that allows this Application to incorporate content of this kind on its pages.

Personal Data processed: Trackers; Usage Data.

Place of processing: Ireland – <u>Privacy Policy</u>.

Category of Personal Information collected according to CCPA: internet information.

This processing constitutes:

• a Sale in California

Font Awesome (Fonticons, Inc.)

Font Awesome is a typeface visualisation service provided by Fonticons, Inc. that allows this Application to incorporate content of this kind on its pages.

Personal Data processed: Trackers; Usage Data.

Place of processing: United States – Privacy Policy.

Category of Personal Information collected according to CCPA: internet information.

This processing constitutes:

• a Sale in California

Fonts.com Web Fonts (Monotype Imaging Inc.)

Fonts.com Web Fonts is a typeface visualisation service provided by Monotype Imaging Inc. that allows this Application to incorporate content of this kind on its pages.

Personal Data processed: Trackers; Usage Data.

Place of processing: United States - Privacy Policy.

Category of Personal Information collected according to CCPA: internet information.

This processing constitutes:

· a Sale in California

Calendly widget (Calendly, LLC)

Calendly widget is a calendar content visualisation service provided by Calendly, LLC that allows this Application to incorporate content of this kind on its pages.

Personal Data processed: calendar information; device information; email address; geographic position; name; phone number; Trackers.

Place of processing: United States – Privacy Policy.

Category of Personal Information collected according to CCPA: identifiers; internet information; geolocation data.

This processing constitutes:

• a Sale in California

Wistia widget (Wistia, Inc.)

Wistia is a video content visualisation service provided by Wistia, Inc. that allows this Application to incorporate content of this kind on its pages.

Personal Data processed: Trackers; Usage Data.

Place of processing: United States – <u>Privacy Policy</u>.

Category of Personal Information collected according to CCPA: internet information.

This processing constitutes:

• a Sale in California

Wistia widget (Privacy Mode) (Wistia, Inc.)

Wistia is a video content visualisation service provided by Wistia, Inc. that allows this Application to incorporate content of this kind on its pages.

This widget is set up in a way that ensures that Wistia only collects fully anonymised viewing data about Users on this Application unless they opt in to being tracked.

Personal Data processed: Usage Data.

Place of processing: United States – Privacy Policy.

Category of Personal Information collected according to CCPA: internet information.

This processing constitutes:

• a Sale in California

Google Calendar widget (Google Ireland Limited)

Google Calendar widget is a calendar content visualisation service provided by Google Ireland Limited that allows this Application to incorporate content of this kind on its pages.

Personal Data processed: Trackers; Usage Data.

Place of processing: Ireland – Privacy Policy.

Category of Personal Information collected according to CCPA: internet information.

This processing constitutes:

• a Sale in California

Handling activities related to productivity

This type of service helps the Owner to manage tasks, collaboration and, in general, activities related to productivity. In using this type of service, Data of Users will be processed and may be retained, depending on the purpose of the activity in question. These services may be integrated with a wide range of third-party services disclosed within this privacy policy to enable the Owner to import or export Data needed for the relative activity.

Calendly (Calendly, LLC)

Calendly is a service provided by Calendly, LLC, that facilitates online scheduling of appointments.

Personal Data processed: device information; email address; geographic position; name; phone number; Trackers.

Place of processing: United States – Privacy Policy.

Category of Personal Information collected according to CCPA: identifiers; internet information; geolocation data.

This processing constitutes:

Gmail (Google LLC)

Gmail is a service that manages email communication provided by Google LLC. Such email communication is not scanned by Google for advertising purposes. In addition, Google does not collect or use data inside this service for advertising purposes in any other way.

Personal Data processed: city; company name; country; Data communicated while using the service; date of birth; email address; first name; last name; phone number; physical address; Trackers; Usage Data.

Place of processing: United States – Privacy Policy.

Category of Personal Information collected according to CCPA: identifiers; commercial information; internet information.

This processing constitutes:

Handling activity data

This type of service allows the Owner to use the activity data collected by your device in order for this Application to operate or to provide specific features. This may include movements, heartbeat, change in altitude or data about the surroundings. Depending on what is described below, third parties may be involved in the activity tracking.

Most devices allow for the User to control which Data is accessed or stored.

Activity data tracked by your device (this Application)

This Application uses some activity data tracked by your device to operate or to provide specific features.

Personal Data processed: general activity data.

Category of Personal Information collected according to CCPA: geolocation data.

This processing constitutes:

Handling payments

Unless otherwise specified, this Application processes any payments by credit card, bank transfer or other means via external payment service providers. In general and unless where otherwise stated, Users are requested to provide their payment details and personal information directly to such payment service providers. This Application isn't involved in the collection and processing of such information: instead, it will only receive a notification by the relevant payment service provider as to whether payment has been successfully completed.

Stripe (Stripe Payments Ltd)

Stripe is a payment service provided by Stripe Payments Ltd.

Personal Data processed: billing address; email address; first name; last name; purchase history; various types of Data as specified in the privacy policy of the service.

Place of processing: United Kingdom – Privacy Policy.

Category of Personal Information collected according to CCPA: identifiers; commercial information.

This processing constitutes:

Payment by bank transfer (this Application)

In the event that the chosen payment method is a direct bank transfer to the current account indicated by this Application, the Owner will collect the payment details of the User, i. e. the current account number of the sender, the SWIFT code, the bank and the name of the sender. Such data will be collected and processed exclusively within the transaction and for billing purposes only.

Personal Data processed: first name; last name; physical address.

Category of Personal Information collected according to CCPA: identifiers.

This processing constitutes:

PayPal (PayPal Inc.)

PayPal is a payment service provided by PayPal Inc., which allows Users to make online payments.

Personal Data processed: device information; email address; first name; last name; phone number; purchase history; Trackers; Usage Data; various types of Data as specified in the privacy policy of the service.

Place of processing: See the PayPal privacy policy – Privacy Policy.

Category of Personal Information collected according to CCPA: identifiers; commercial information; internet information.

This processing constitutes:

• a Sale in Virginia, Colorado, Connecticut, Utah, Texas, Oregon, Nevada, Delaware, Iowa, New Hampshire, New Jersey, Nebraska and Montana

PayPal Carrier Payments (PayPal Inc.)

PayPal Carrier Payments is a payment service provided by PayPal, Inc., which allows Users to make online payments using their mobile phone operator.

Personal Data processed: device information; email address; first name; last name; phone number; purchase history; Trackers; Usage Data; various types of Data as specified in the privacy policy of the service.

Place of processing: See the PayPal privacy policy – Privacy Policy.

Category of Personal Information collected according to CCPA: identifiers; commercial information; internet information.

This processing constitutes:

PayPal Payments Hub (PayPal Inc.)

PayPal Payments Hub is a payment service provided by PayPal Inc.

Personal Data processed: device information; email address; first name; last name; phone number; purchase history; Trackers; Usage Data; various types of Data as specified in the privacy policy of the service.

Place of processing: See the PayPal privacy policy – Privacy Policy.

Category of Personal Information collected according to CCPA: identifiers; commercial information; internet information.

This processing constitutes:

Quaderno (Recrea Systems, SLU)

Quaderno is a billing management and product checkout page service provided by Recrea Systems, SLU, which allows the Owner to automate tax compliance for online payments on this Application.

Personal Data processed: billing address; coarse location; country; email address; first name; last name; phone number; purchase history; Trackers; Usage Data.

Place of processing: Spain – Privacy Policy.

Category of Personal Information collected according to CCPA: identifiers; commercial information; internet information; geolocation data.

This processing constitutes:

Heat mapping and session recording

Heat mapping services are used to display the areas of this Application that Users interact with most frequently. This shows where the points of interest are. These services make it possible to monitor and analyse web traffic and keep track of User behaviour.

Some of these services may record sessions and make them available for later visual playback.

Hotjar Heat Maps & Recordings (Hotjar Ltd.)

Hotjar is a session recording and heat mapping service provided by Hotjar Ltd.

Hotjar honours generic "Do Not Track" headers. This means the browser can tell its script not to collect any of the User's data. This is a setting that is available in all major browsers. Find Hotjar's <u>opt-out information here</u>.

Personal Data processed: Trackers; Usage Data; various types of Data as specified in the privacy policy of the service.

Place of processing: Malta – <u>Privacy Policy</u> – <u>Opt Out</u>.

Category of Personal Information collected according to CCPA: identifiers; internet information.

This processing constitutes:

• a Sale in California

Interaction with external social networks and platforms

This type of service allows interaction with social networks or other external platforms directly from the pages of this Application.

The interaction and information obtained through this Application are always subject to the User's privacy settings for each social network.

This type of service might still collect traffic data for the pages where the service is installed, even when Users do not use it. It is recommended to log out from the respective services in order to make sure that the processed data on this Application isn't being connected back to the User's profile.

Twitter Tweet button and social widgets (X Corp.)

The Twitter Tweet button and social widgets are services allowing interaction with the Twitter social network provided by Twitter, Inc.

Personal Data processed: Trackers; Usage Data.

Place of processing: United States – Privacy Policy.

Category of Personal Information collected according to CCPA: internet information.

This processing constitutes:

• a Sale in California

PayPal button and widgets (PayPal Inc.)

The PayPal button and widgets are services allowing interaction with the PayPal platform provided by PayPal Inc.

Personal Data processed: Trackers; Usage Data.

Place of processing: See the PayPal privacy policy – Privacy Policy.

Category of Personal Information collected according to CCPA: internet information.

This processing constitutes:

• a Sale in California

LinkedIn button and social widgets (LinkedIn Corporation)

The LinkedIn button and social widgets are services allowing interaction with the LinkedIn social network provided by LinkedIn Corporation.

Personal Data processed: Trackers; Usage Data.

Place of processing: United States – Privacy Policy.

Category of Personal Information collected according to CCPA: internet information.

This processing constitutes:

• a Sale in California

Google Friend Connect (Google Ireland Limited)

Google Friend Connect is a social interaction service provided by Google Ireland Limited.

Personal Data processed: Trackers; Usage Data.

Place of processing: Ireland – Privacy Policy.

Category of Personal Information collected according to CCPA: internet information.

This processing constitutes:

• a Sale in California

Facebook Like button and social widgets (Meta Platforms Ireland Limited)

The Facebook Like button and social widgets are services allowing interaction with the Facebook social network provided by Meta Platforms Ireland Limited

Personal Data processed: Trackers; Usage Data.

Place of processing: Ireland – <u>Privacy Policy</u>.

Category of Personal Information collected according to CCPA: internet information.

This processing constitutes:

• a Sale in the United States

Location-based interactions

Non-continuous geolocation (this Application)

This Application may collect, use, and share User location Data in order to provide location-based services.

Most browsers and devices provide tools to opt out from this feature by default. If explicit authorisation has been provided, the User's location data may be tracked by this Application.

The geographic location of the User is determined in a manner that isn't continuous, either at the specific request of the User or when the User doesn't point out its current location in the appropriate field and allows the application to detect the position automatically.

Personal Data processed: geographic position.

Category of Personal Information collected according to CCPA: geolocation data.

This processing constitutes:

• a Sharing in California

Managing contacts and sending messages

This type of service makes it possible to manage a database of email contacts, phone contacts or any other contact information to communicate with the User.

These services may also collect data concerning the date and time when the message was viewed by the User, as well as when the User interacted with it, such as by clicking on links included in the message.

Mailchimp (Intuit Inc.)

Mailchimp is an email address management and message sending service provided by Intuit Inc.

Personal Data processed: country; Data communicated while using the service; date of birth; email address; first name; last name; phone number; physical address; various types of Data.

Place of processing: United States – Privacy Policy.

Category of Personal Information collected according to CCPA: identifiers; internet information.

This processing constitutes:

- a Sale in the United States
- a Sharing in California

ZOHO Campaigns (Zoho Corporation Pvt. Ltd.)

ZOHO Campaigns is an email address management and message sending service provided by Zoho Corporation Pvt. Ltd.

Personal Data processed: company name; country; date of birth; email address; first name; invoicing information; language; last name; phone number; physical address; profession; Usage Data.

Place of processing: United States – <u>Privacy Policy</u>.

Category of Personal Information collected according to CCPA: identifiers; commercial information; internet information; employment related information; inferred information.

This processing constitutes:

- a Sale in California
- · a Sharing in California

Managing landing and invitation pages

This type of service helps with building and managing landing and invitation pages, i.e., pages for presenting a product or service, where you may add your contact information such as an email address.

Managing these pages means that these services will handle the Personal Data collected through the pages, including Usage Data.

Mailchimp Landing Page (Intuit Inc.)

Mailchimp Landing Page is a landing page management service provided by Intuit Inc, that allows this Application to collect the email addresses of Users interested in its service.

Mailchimp Landing Page allows the Owner to track and analyse the User response concerning web traffic or behaviour regarding changes to the structure, text or any other component of the created landing pages.

Personal Data processed: country; date of birth; email address; first name; last name; phone number; Usage Data.

Place of processing: United States – <u>Privacy Policy</u>.

Category of Personal Information collected according to CCPA: identifiers; internet information.

This processing constitutes:

• a Sale in California

Managing support and contact requests

This type of service allows this Application to manage support and contact requests received via email or by other means, such as the contact form.

The Personal Data processed depend on the information provided by the User in the messages and the means used for communication (e.g. email address).

ZOHO CRM Email (Zoho Corporation Pvt. Ltd.)

ZOHO CRM Email is a support and contact request management service provided by Zoho Corporation Pvt. Ltd.

Personal Data processed: company name; country; Data communicated while using the service; date of birth; email address; first name; invoicing information; language; last name; phone number; physical address; Usage Data; various types of Data as specified in the privacy policy of the service.

Place of processing: United States – Privacy Policy.

Category of Personal Information collected according to CCPA: identifiers; commercial information; internet information; inferred information.

This processing constitutes:

• a Sale in California

Registration and authentication

By registering or authenticating, Users allow this Application to identify them and give them access to dedicated services. Depending on what is described below, third parties may provide registration and authentication services. In this case, this Application will be able to access some Data, stored by these third-party services, for registration or identification purposes. Some of the services listed below may also collect Personal Data for targeting and profiling purposes; to find out more, please refer to the description of each service.

Direct registration and profiling (this Application)

By registering or authenticating directly through this Application, Users allow this Application to identify them and give them access to dedicated services. The Owner may process Data collected when Users register or authenticate also for targeting and profiling purposes; to find out more, Users can contact the Owner using the contact details provided in this document.

Personal Data processed: billing address; company name; country; data relating to the point of sale; date of birth; email address; first name; house number; language; last name; phone number; physical address; website; ZIP/Postal code.

Category of Personal Information collected according to CCPA: identifiers; commercial information; internet information; inferred information.

This processing constitutes:

• a Sale in California

Facebook Oauth (Meta Platforms Ireland Limited)

Facebook Oauth is a registration and authentication service provided by Meta Platforms Ireland Limited and is connected to the Facebook social network.

Personal Data processed: Trackers; various types of Data.

Place of processing: Ireland – <u>Privacy Policy</u>.

Category of Personal Information collected according to CCPA: identifiers; internet information.

This processing constitutes:

• a Sale in California

Facebook Authentication (Meta Platforms Ireland Limited)

Facebook Authentication is a registration and authentication service provided by Meta Platforms Ireland Limited and is connected to the Facebook social network.

Personal Data processed: Trackers; various types of Data as specified in the privacy policy of the service.

Place of processing: Ireland – <u>Privacy Policy</u>.

Category of Personal Information collected according to CCPA: identifiers; internet information.

This processing constitutes:

• a Sale in California

Google OAuth (Google Ireland Limited)

Google OAuth is a registration and authentication service provided by Google Ireland Limited and is connected to the Google network.

Personal Data processed: various types of Data as specified in the privacy policy of the service.

Place of processing: Ireland – <u>Privacy Policy</u>.

Category of Personal Information collected according to CCPA: identifiers.

This processing constitutes:

• a Sale in the United States

Linkedin OAuth (LinkedIn Corporation)

Linkedin Oauth is a registration and authentication service provided by Linkedin Corporation and is connected to the Linkedin social network.

Personal Data processed: Trackers; Usage Data; various types of Data as specified in the privacy policy of the service.

Place of processing: United States – Privacy Policy.

Category of Personal Information collected according to CCPA: identifiers; internet information.

This processing constitutes:

• a Sale in the United States

Log In with PayPal (PayPal Inc.)

Log In with PayPal is a registration and authentication service provided by PayPal Inc. and is connected to the PayPal network.

Personal Data processed: various types of Data as specified in the privacy policy of the service.

Place of processing: See the PayPal privacy policy – <u>Privacy Policy</u>.

Category of Personal Information collected according to CCPA: identifiers.

This processing constitutes:

a Sale in California

Stripe OAuth (Stripe Payments Ltd)

Stripe OAuth is a registration and authentication service provided by Stripe, Inc. and is connected to the Stripe network.

Personal Data processed: Trackers; various types of Data as specified in the privacy policy of the service.

Place of processing: United Kingdom – <u>Privacy Policy</u>.

Category of Personal Information collected according to CCPA: identifiers; internet information.

This processing constitutes:

• a Sale in California

Registration and authentication provided directly by this Application

By registering or authenticating, Users allow this Application to identify them and give them access to dedicated services. The Personal Data is collected and stored for registration or identification purposes only. The Data collected are only those necessary for the provision of the service requested by the Users.

Direct registration (this Application)

The User registers by filling out the registration form and providing the Personal Data directly to this Application.

Personal Data processed: billing address; city; company name; country; date of birth; email address; first name; house number; language; last name; phone number; physical address; various types of Data; website; ZIP/Postal code.

Category of Personal Information collected according to CCPA: identifiers; commercial information; internet information; inferred information.

This processing constitutes:

SPAM protection

This type of service analyses the traffic of this Application, potentially containing Users' Personal Data, with the purpose of filtering it from parts of traffic, messages and content that are recognised as SPAM.

Google reCAPTCHA (Google Ireland Limited)

Google reCAPTCHA is a SPAM protection service provided by Google Ireland Limited. The use of reCAPTCHA is subject to the Google <u>privacy policy</u> and <u>terms of use</u>.

In order to understand Google's use of Data, consult **Google's partner policy**.

Personal Data processed: answers to questions; clicks; keypress events; motion sensor events; mouse movements; scroll position; touch events; Trackers; Usage Data.

Place of processing: Ireland – <u>Privacy Policy</u>.

Category of Personal Information collected according to CCPA: internet information; inferred information.

This processing constitutes:

Tag Management

This type of service helps the Owner to manage the tags or scripts needed on this Application in a centralised fashion. This results in the Users' Data flowing through these services, potentially resulting in the retention of this Data.

Google Tag Manager (Google Ireland Limited)

Google Tag Manager is a tag management service provided by Google Ireland Limited.

Personal Data processed: Usage Data.

Place of processing: Ireland – Privacy Policy.

Category of Personal Information collected according to CCPA: internet information.

This processing constitutes:

Traffic optimisation and distribution

This type of service allows this Application to distribute their content using servers located across different countries and to optimise their performance.

Which Personal Data are processed depends on the characteristics and the way these services are implemented. Their function is to filter communications between this Application and the User's browser.

Considering the widespread distribution of this system, it is difficult to determine the locations to which the contents that may contain Personal Information of the User are transferred.

Cloudflare (Cloudflare Inc.)

Cloudflare is a traffic optimisation and distribution service provided by Cloudflare Inc.

The way Cloudflare is integrated means that it filters all the traffic through this Application, i.e., communication between this Application and the User's browser, while also allowing analytical data from this Application to be collected.

Personal Data processed: various types of Data as specified in the privacy policy of the service.

Place of processing: United States – <u>Privacy Policy</u>.

Category of Personal Information collected according to CCPA: identifiers.

This processing constitutes:

• a Sale in California

User database management

This type of service allows the Owner to build user profiles by starting from an email address, a personal name, or other information that the User provides to this Application, as well as to track User activities through analytics features. This Personal Data may also be matched with publicly available information about the User (such as social networks' profiles) and used to build private profiles that the Owner can display and use for improving this Application.

Some of these services may also enable the sending of timed messages to the User, such as emails based on specific actions performed on this Application.

ZOHO CRM (Zoho Corporation Pvt. Ltd.)

ZOHO CRM is a User database management service provided by Zoho Corporation Pvt. Ltd.

Personal Data processed: company name; country; date of birth; email address; first name; invoicing information; language; phone number; various types of Data as specified in the privacy policy of the service.

Place of processing: United States – Privacy Policy.

Category of Personal Information collected according to CCPA: identifiers; commercial information; inferred information.

This processing constitutes:

• a Sale in California

ZoomInfo (ZoomInfo UK Ltd)

ZoomInfo is a User database management platform with integrated tools for sales, marketing, and recruitment. It is provided by ZoomInfo UK Ltd.

Personal Data processed: company name; country; date of birth; email address; first name; language; last name.

Place of processing: United Kingdom – <u>Privacy Policy</u>.

Category of Personal Information collected according to CCPA: identifiers; commercial information; inferred information.

This processing constitutes:

• a Sale in California

Further information about the processing of Personal Data

Analysis and predictions based on the User's Data ("profiling")

The Owner may use the Personal and Usage Data collected through this Application to create or update User profiles. This type of Data processing allows the Owner to evaluate User choices, preferences and behaviour for the purposes outlined in the respective section of this document.

User profiles can also be created through the use of automated tools like algorithms, which can also be provided by third parties. To find out more about the profiling activities performed, Users can check the relevant sections of this document. The User always has a right to object to this kind of profiling activity. To find out more about the User's rights and how to exercise them, the User is invited to consult the section of this document outlining the rights of the User.

Automated decision-making

Automated decision-making means that a decision which is likely to have legal effects or similarly significant effects on the User, is taken solely by technological means, without any human intervention. This Application may use the User's Personal Data to make decisions entirely or partially based on automated processes according to the purposes outlined in this document. This Application adopts automated decision-making processes as far as necessary to enter into or perform a contract between User and Owner, or on the basis of the User's explicit consent, where such consent is required by the law.

Automated decisions are made by technological means – mostly based on algorithms subject to predefined criteria – which may

also be provided by third parties.

The rationale behind the automated decision making is:

- to enable or otherwise improve the decision-making process;
- to grant Users fair and unbiased treatment based on consistent and uniform criteria;
- to reduce the potential harm derived from human error, personal bias and the like which may potentially lead to discrimination or imbalance in the treatment of individuals etc.;
- to reduce the risk of User's failure to meet their obligation under a contract. To find out more about the purposes, the third-party services, if any, and any specific rationale for automated decisions used within this Application, Users can check the relevant sections in this document.

Consequences of automated decision-making processes for Users and rights of Users subjected to it

As a consequence, Users subject to such processing, are entitled to exercise specific rights aimed at preventing or otherwise limiting the potential effects of the automated decisions taken. In particular, Users have the right to:

- obtain an explanation about any decision taken as a result of automated decision-making and express their point of view regarding this decision;
- challenge a decision by asking the Owner to reconsider it or take a new decision on a different basis;
- request and obtain from the Owner human intervention on such processing.

To learn more about the User's rights and the means to exercise them, the User is invited to consult the section of this document relating to the rights of the User.

Equal protection of User Data

This Application shares User Data only with third parties carefully selected to ensure that they provide the same or equal protection of User Data as stated in this privacy policy and requested by applicable data protection laws. Further information on data processing and privacy practices by third parties can be found in their respective privacy policies.

Personal Data collected through sources other than the User

The Owner of this Application may have legitimately collected Personal Data relating to Users without their knowledge by reusing or sourcing them from third parties on the grounds mentioned in the section specifying the legal basis of processing. Where the Owner has collected Personal Data in such a manner, Users may find specific information regarding the source within the relevant sections of this document or by contacting the Owner.

Preference Cookies

Preference Cookies store the User preferences detected on this Application in the local domain such as, for example, their timezone and region.

localStorage

localStorage allows this Application to store and access data right in the User's browser with no expiration date.

Selling goods and services online

The Personal Data collected are used to provide the User with services or to sell goods, including payment and possible delivery. The Personal Data collected to complete the payment may include the credit card, the bank account used for the transfer, or any other means of payment envisaged. The kind of Data collected by this Application depends on the payment system used.

sessionStorage

sessionStorage allows this Application to store and access data right in the User's browser. Data in sessionStorage is deleted automatically when the session ends (in other words, when the browser tab is closed).

The Service is not directed to children under the age of 13

Users declare themselves to be adult according to their applicable legislation. Minors may use this Application only with the assistance of a parent or guardian. Under no circumstance persons under the age of 13 may use this Application.

Push notifications

This Application may send push notifications to the User to achieve the purposes outlined in this privacy policy.

Users may in most cases opt-out of receiving push notifications by visiting their device settings, such as the notification settings for mobile phones, and then change those settings for this Application, some or all of the apps on the particular device. Users must be aware that disabling push notifications may negatively affect the utility of this Application.

Cookie Policy

This Application uses Trackers. To learn more, Users may consult the **Cookie Policy**.

Further Information for Users in the European Union

This section applies to all Users in the European Union, according to the General Data Protection Regulation (the "GDPR"), and, for such Users, supersedes any other possibly divergent or conflicting information contained in the privacy policy. Further details regarding the categories of Data processed, the purposes of processing, the categories of recipients of the Personal Data, if any, and further information about Personal Data can be found in **the section titled "Detailed information on the processing of Personal Data" within this document**.

Legal basis of processing

The Owner may process Personal Data relating to Users if one of the following applies:

- Users have given their consent for one or more specific purposes.
- provision of Data is necessary for the performance of an agreement with the User and/or for any pre-contractual obligations thereof;
- processing is necessary for compliance with a legal obligation to which the Owner is subject;
- processing is related to a task that is carried out in the public interest or in the exercise of official authority vested in the Owner;
- processing is necessary for the purposes of the legitimate interests pursued by the Owner or by a third party.

In any case, the Owner will gladly help to clarify the specific legal basis that applies to the processing, and in particular whether the provision of Personal Data is a statutory or contractual requirement, or a requirement necessary to enter into a contract.

Further information about retention time

Personal Data shall be processed and stored for as long as required by the purpose they have been collected for.

Therefore:

- Personal Data collected for purposes related to the performance of a contract between the Owner and the User shall be retained until such contract has been fully performed.
- Personal Data collected for the purposes of the Owner's legitimate interests shall be retained as long as needed to fulfill such purposes. Users may find specific information regarding the legitimate interests pursued by the Owner within the relevant sections of this document or by contacting the Owner.

The Owner may be allowed to retain Personal Data for a longer period whenever the User has given consent to such processing, as long as such consent is not withdrawn. Furthermore, the Owner may be obliged to retain Personal Data for a longer period whenever required to fulfil a legal obligation or upon order of an authority.

Once the retention period expires, Personal Data shall be deleted. Therefore, the right of access, the right to erasure, the right to rectification and the right to data portability cannot be enforced after expiration of the retention period.

The rights of Users based on the General Data Protection Regulation (GDPR)

Users may exercise certain rights regarding their Data processed by the Owner.

In particular, Users have the right to do the following, to the extent permitted by law:

- **Withdraw their consent at any time.** Users have the right to withdraw consent where they have previously given their consent to the processing of their Personal Data.
- **Object to processing of their Data.** Users have the right to object to the processing of their Data if the processing is carried out on a legal basis other than consent.
- **Access their Data.** Users have the right to learn if Data is being processed by the Owner, obtain disclosure regarding certain aspects of the processing and obtain a copy of the Data undergoing processing.
- Verify and seek rectification. Users have the right to verify the accuracy of their Data and ask for it to be updated or corrected.
- **Restrict the processing of their Data.** Users have the right to restrict the processing of their Data. In this case, the Owner will not process their Data for any purpose other than storing it.

- Have their Personal Data deleted or otherwise removed. Users have the right to obtain the erasure of their Data from the Owner
- **Receive their Data and have it transferred to another controller.** Users have the right to receive their Data in a structured, commonly used and machine readable format and, if technically feasible, to have it transmitted to another controller without any hindrance.
- Lodge a complaint. Users have the right to bring a claim before their competent data protection authority.

Users are also entitled to learn about the legal basis of Data transfers to a country outside the European Union or to any international organisation governed by public international law or set up by two or more countries, such as the UN, and about the security measures taken by the Owner to safeguard their Data.

If any such transfer takes place, Users can find out more by checking the relevant sections of this document or enquire with the Owner using the information provided in the contact section.

Details about the right to object to processing

Where Personal Data is processed for a public interest, in the exercise of an official authority vested in the Owner or for the purposes of the legitimate interests pursued by the Owner, Users may object to such processing by providing a ground related to their particular situation to justify the objection.

Users must know that, however, should their Personal Data be processed for direct marketing purposes, they can object to that processing at any time, free of charge and without providing any justification. Where the User objects to processing for direct marketing purposes, the Personal Data will no longer be processed for such purposes. To learn whether the Owner is processing Personal Data for direct marketing purposes, Users may refer to the relevant sections of this document.

How to exercise these rights

Any requests to exercise User rights can be directed to the Owner through the contact details provided in this document. Such requests are free of charge and will be answered by the Owner as early as possible and always within one month, providing Users with the information required by law. Any rectification or erasure of Personal Data or restriction of processing will be communicated by the Owner to each recipient, if any, to whom the Personal Data has been disclosed unless this proves impossible or involves disproportionate effort. At the Users' request, the Owner will inform them about those recipients.

Transfer of Personal Data outside of the European Union

Data transfer abroad based on consent

If this is the legal basis, Personal Data of Users shall be transferred from the EU to third countries only if the User has explicitly consented to such transfer, after having been informed of the possible risks due to the absence of an adequacy decision and appropriate safeguards.

In such cases, the Owner shall inform Users appropriately and collect their explicit consent via this Application.

Data transfer abroad based on standard contractual clauses

If this is the legal basis, the transfer of Personal Data from the EU to third countries is carried out by the Owner according to "standard contractual clauses" provided by the European Commission.

This means that Data recipients have committed to process Personal Data in compliance with the data protection standards set forth by EU data protection legislation. For further information, Users are requested to contact the Owner through the contact details provided in the present document.

Data transfer to countries that guarantee European standards

If this is the legal basis, the transfer of Personal Data from the EU to third countries is carried out according to an adequacy decision of the European Commission.

The European Commission adopts adequacy decisions for specific countries whenever it considers that country to possess and provide Personal Data protection standards comparable to those set forth by EU data protection legislation. Users can find an updated list of all adequacy decisions issued on the European Commission's website.

Other legal basis for Data transfer abroad

If no other legal basis applies, Personal Data shall be transferred from the EU to third countries only if at least one of the following conditions is met:

• the transfer is necessary for the performance of a contract between the User and the Owner or of pre-contractual measures taken at the User's request;

- the transfer is necessary for the conclusion or performance of a contract concluded in the interest of the User between the Owner and another natural or legal person;
- the transfer is necessary for important reasons of public interest;
- the transfer is necessary for establishment, exercise or defence of legal claims;
- the transfer is necessary in order to protect the vital interests of the data subject or of other persons, where the data subject is physically or legally incapable of giving consent;
- the data transferred is sourced from a public register created under the law of the country that the data originates from;
- subject to further conditions, the Owner has a compelling legitimate interest to perform a one-off transfer of Personal Data.

In such cases, the Owner shall inform the User about the legal bases the transfer is based on via this Application.

Transfer of Personal Data outside of the United Kingdom

Data transfer abroad based on consent (UK)

If this is the legal basis, Personal Data of Users shall be transferred from the UK to third countries only if the User has explicitly consented to such transfer, after having been informed of the possible risks due to the absence of an adequacy decision and appropriate safeguards.

In such cases, the Owner shall inform Users appropriately and collect their explicit consent via this Application.

Data transfer abroad based on standard contractual clauses (UK)

If this is the legal basis, the transfer of Personal Data from the UK to third countries is carried out by the Owner according to "standard contractual clauses" provided by the European Commission.

This means that Data recipients have committed to process Personal Data in compliance with the data protection standards set forth by EU data protection legislation, which are recognized as valid also under UK law. For further information, Users are requested to contact the Owner through the contact details provided in the present document.

Data transfers according to a UK adequacy regulation

If this is the legal basis, the transfer of Personal Data from the UK to third countries may take place according to a so called "adequacy regulation" of the UK Government.

The UK Government adopts adequacy regulations for specific countries or territories whenever such countries or territories guarantee Personal Data protection standards comparable to those set forth by UK data protection legislation. Users can find an updated list of all adequacy regulations on the website of the Information Commissioner's Office (ICO).

Other legal basis for Data transfer abroad (UK)

If no other legal basis applies, Personal Data shall be transferred from the UK to third countries only if at least one of the following conditions is met:

- the transfer is necessary for the performance of a contract between the User and the Owner or of pre-contractual measures taken at the User's request;
- the transfer is necessary for the conclusion or performance of a contract concluded in the interest of the User between the Owner and another natural or legal person;
- the transfer is necessary for important reasons of public interest;
- the transfer is necessary for establishment, exercise or defence of legal claims;
- the transfer is necessary in order to protect the vital interests of the data subject or of other persons, where the data subject is physically or legally incapable of giving consent;
- the data transferred is sourced from a public register created under UK law;
- subject to further conditions, the Owner has a compelling legitimate interest to perform a one-off transfer of Personal Data.

In such cases, the Owner shall inform the User about the legal bases the transfer is based on via this Application.

Further information for Users in the United States

This part of the document integrates with and supplements the information contained in the rest of the privacy policy and is provided by the business running this Application and, if the case may be, its parent, subsidiaries and affiliates (for the purposes of this section referred to collectively as "we", "us", "our").

The information contained in this section applies to all Users (Users are referred to below, simply as "you", "your", "yours"), who are residents in the following states: California, Virginia, Colorado, Connecticut, Utah, Texas, Oregon, Nevada, Delaware, Iowa, New Hampshire, New Jersey, Nebraska and Montana.

For such Users, this information supersedes any other possibly divergent or conflicting provisions contained in the privacy policy.

This part of the document uses the term Personal Information.

Notice at collection

The following Notice at collection provides you with timely notice about the **categories of Personal Information collected or disclosed in the past 12 months** so that you can exercise meaningful control over our use of that Information.

While such categorization of Personal Information is mainly based on California privacy laws, it can also be helpful for anyone who is not a California resident to get a general idea of what types of Personal Information are collected.

• •

Internet or other electronic network activity information

• •

Inferences drawn from other personal information

• •

Identifiers

• •

Commercial information

• •

Geolocation data

• •

Employment related information

i You can read the definitions of these concepts inside the "<u>Definitions and legal references section</u>" of the privacy policy.

To know more about your rights in particular to opt out of certain processing activities you can refer to the "<u>Your privacy</u> <u>rights under US state laws</u>" section of our privacy policy.

For more details on the collection of Personal Information, please read the section "<u>Detailed information on the processing of Personal Data</u>" of our privacy policy.

We won't process your Information for unexpected purposes, or for purposes that are not reasonably necessary to and compatible with the purposes originally disclosed, without your consent.

What are the sources of the Personal Information we collect?

We collect the above-mentioned categories of Personal Information, either directly or indirectly, from you when you use this Application.

For example, you directly provide your Personal Information when you submit requests via any forms on this Application. You also provide Personal Information indirectly when you navigate this Application, as Personal Information about you is automatically observed and collected.

Finally, we may collect your Personal Information from third parties that work with us in connection with the Service or with the functioning of this Application and features thereof.

Your privacy rights under US state laws

You may exercise certain rights regarding your Personal Information. In particular, to the extent permitted by applicable law, you have:

- **the right to access Personal Information: the right to know.** You have the right to request that we confirm whether or not we are processing your Personal Information. You also have the right to access such Personal Information;
- **the right to correct inaccurate Personal Information.** You have the right to request that we correct any inaccurate Personal Information we maintain about you:
- the right to request the deletion of your Personal Information. You have the right to request that we delete any of your Personal Information;
- **the right to obtain a copy of your Personal Information.** We will provide your Personal Information in a portable and usable format that allows you to transfer data easily to another entity provided that this is technically feasible;
- **the right to opt out from the Sale of your Personal Information;** We will not discriminate against you for exercising your privacy rights.
- the right to non-discrimination.

Additional rights for Users residing in California

In addition to the rights listed above common to all Users in the United States, as a User residing in California, you have

- The right to opt out of the Sharing of your Personal Information for cross-context behavioral advertising;
- The right to request to limit our use or disclosure of your Sensitive Personal Information to only that which is necessary to perform the services or provide the goods, as is reasonably expected by an average consumer. Please note that certain exceptions outlined in the law may apply, such as, when the collection and processing of Sensitive Personal Information is necessary to verify or maintain the quality or safety of our service.

Additional rights for Users residing in Virginia, Colorado, Connecticut, Texas, Oregon, Nevada, Delaware, Iowa, New Hampshire, New Jersey, Nebraska and Montana

In addition to the rights listed above common to all Users in the United States, as a User residing in Virginia, Colorado, Connecticut, Texas, Oregon, Nevada, Delaware, Iowa, New Hampshire, New Jersey, Nebraska and Montana you have

- The right to opt out of the processing of your personal information for Targeted Advertising or profiling in furtherance of decisions that produce legal or similarly significant effects concerning you;
- The right to freely give, deny or withdraw your consent for the processing of your Sensitive Personal Information.

 Please note that certain exceptions outlined in the law may apply, such as, but not limited to, when the collection and processing of Sensitive Personal Information is necessary for the provision of a product or service specifically requested by the consumer.

Additional rights for users residing in Utah and Iowa

In addition to the rights listed above common to all Users in the United States, as a User residing in Utah and Iowa, you have

- The right to opt out of the processing of your Personal Information for Targeted Advertising;
- The right to opt out of the processing of your Sensitive Personal Information. Please note that certain exceptions outlined in the law may apply, such as, but not limited to, when the collection and processing of Sensitive Personal Information is necessary for the provision of a product or service specifically requested by the consumer.

How to exercise your privacy rights under US state laws

To exercise the rights described above, you need to submit your request to us by contacting us via the contact details provided in this document.

For us to respond to your request, we must know who you are. We will not respond to any request if we are unable to verify your identity and therefore confirm the Personal Information in our possession relates to you. You are not required to create an account with us to submit your request. We will use any Personal Information collected from you in connection with the verification of your request solely for verification and shall not further disclose the Personal Information, retain it longer than necessary for purposes of verification, or use it for unrelated purposes.

If you are an adult, you can make a request on behalf of a child under your parental authority.

How to exercise your rights to opt out

In addition to what is stated above, to exercise your right to opt-out of Sale or Sharing and Targeted Advertising you can also use the privacy choices link provided on this Application.

If you want to submit requests to opt out of Sale or Sharing and Targeted Advertising activities via a user-enabled **global privacy control**, such as for example the Global Privacy Control ("GPC"), you are free to do so and we will abide by such request in a frictionless manner.

How and when we are expected to handle your request

We will respond to your request without undue delay, but in all cases within the timeframe required by applicable law. Should we need more time, we will explain to you the reasons why, and how much more time we need.

Should we deny your request, we will explain to you the reasons behind our denial (where envisaged by applicable law you may then contact the relevant authority to submit a complaint).

We do not charge a fee to process or respond to your request unless such request is manifestly unfounded or excessive and in all other cases where it is permitted by the applicable law. In such cases, we may charge a reasonable fee or refuse to act on the request. In either case, we will communicate our choices and explain the reasons behind them.

Additional information for Users in the United States

Collection of personal information about California consumers aged 13 to 16

We collect personal information of consumers between the age of 13 and 16 and won't sell or share their data personal information unless those consumers have opted in.

We do not collect personal data about Virginia consumers below the age of 13

We do not knowingly collect personal data of Virginia consumers who are below the age of 13 nor do we sell their data or process them for targeted advertising purposes.

We do not collect personal information about California consumers below the age of 16

We do not knowingly collect personal information of consumers who are below the age of 16 nor do we sell or share it.

Additional information about Data collection and processing

Legal action

The User's Personal Data may be used for legal purposes by the Owner in Court or in the stages leading to possible legal action arising from improper use of this Application or the related Services.

The User declares to be aware that the Owner may be required to reveal personal data upon request of public authorities.

Additional information about User's Personal Data

In addition to the information contained in this privacy policy, this Application may provide the User with additional and contextual information concerning particular Services or the collection and processing of Personal Data upon request.

System logs and maintenance

For operation and maintenance purposes, this Application and any third-party services may collect files that record interaction with this Application (System logs) or use other Personal Data (such as the IP Address) for this purpose.

Information not contained in this policy

More details concerning the collection or processing of Personal Data may be requested from the Owner at any time. Please see the contact information at the beginning of this document.

Changes to this privacy policy

The Owner reserves the right to make changes to this privacy policy at any time by notifying its Users on this page and possibly within this Application and/or - as far as technically and legally feasible - sending a notice to Users via any contact information available to the Owner. It is strongly recommended to check this page often, referring to the date of the last modification listed at the bottom.

Should the changes affect processing activities performed on the basis of the User's consent, the Owner shall collect new consent from the User, where required.

Definitions and legal references

Personal Data (or Data) / Personal Information (or Information)

Any information that directly, indirectly, or in connection with other information — including a personal identification number — allows for the identification or identifiability of a natural person.

Sensitive Personal Information

Sensitive Personal Information means any Personal Information that is not publicly available and reveals information considered sensitive according to the applicable privacy law.

Usage Data

Information collected automatically through this Application (or third-party services employed in this Application), which can include: the IP addresses or domain names of the computers utilised by the Users who use this Application, the URI addresses (Uniform Resource Identifier), the time of the request, the method utilised to submit the request to the server, the size of the file received in response, the numerical code indicating the status of the server's answer (successful outcome, error, etc.), the country of origin, the features of the browser and the operating system utilised by the User, the various time details per visit (e.g., the time spent on each page within the Application) and the details about the path followed within the Application with special reference to the sequence of pages visited, and other parameters about the device operating system and/or the User's IT environment.

User

The individual using this Application who, unless otherwise specified, coincides with the Data Subject.

Data Subject

The natural person to whom the Personal Data refers.

Data Processor (or Processor)

The natural or legal person, public authority, agency or other body which processes Personal Data on behalf of the Controller, as described in this privacy policy.

Data Controller (or Owner)

The natural or legal person, public authority, agency or other body which, alone or jointly with others, determines the purposes and means of the processing of Personal Data, including the security measures concerning the operation and use of this Application. The Data Controller, unless otherwise specified, is the Owner of this Application.

This Application

The means by which the Personal Data of the User is collected and processed.

Service

The service provided by this Application as described in the relative terms (if available) and on this site/application.

Sale

Sale means any exchange of Personal Information by the Owner to **a third party, for monetary or other valuable consideration**, as defined by the applicable privacy US state law. Please note that the exchange of Personal Information with a service provider pursuant to a written contract that meets the requirements set by the applicable law, does not constitute a Sale of your Personal Information.

Sharing

Sharing means any sharing, renting, releasing, disclosing, disseminating, making available, transferring, or otherwise communicating orally, in writing, or by electronic or other means, a consumer's Personal Information by the business to a **third party for cross-context behavioural advertising**, whether for monetary or other valuable consideration, including transactions between a business and a third party for cross-context behavioural advertising for the benefit of a business in which no money is exchanged, as defined by the California privacy laws. Please note that the exchange of Personal Information with a service provider pursuant to a written contract that meets the requirements set by the California privacy laws, does not constitute sharing of your Personal Information.

Targeted advertising

Targeted advertising means displaying advertisements to a consumer where the advertisement is selected based on Personal Information obtained from that consumer's activities over time and across nonaffiliated websites or online applications to predict such consumer's preferences or interests, as defined by the applicable privacy US state law.

European Union (or EU)

Unless otherwise specified, all references made within this document to the European Union include all current member states to the European Union and the European Economic Area.

Cookie

Cookies are Trackers consisting of small sets of data stored in the User's browser.

Tracker

Tracker indicates any technology - e.g Cookies, unique identifiers, web beacons, embedded scripts, e-tags and fingerprinting - that enables the tracking of Users, for example by accessing or storing information on the User's device.

Legal information

This privacy statement has been prepared based on provisions of multiple legislations.

This privacy policy relates solely to this Application, if not stated otherwise within this document.

Latest update: 6 March 2023